



WASHINGTON STATE
GAMBLING COMMISSION

Field Operation Rule Interpretation

Question: What is required for a card room operator to change a house banked card game?

CITE: WAC 230-40-815(4) Administrative and accounting control structure-Organization-House banking

SUMMARY

Issue:

House banked card game operators would like to change card games on the gaming floor as quickly as possible (for example, from blackjack to pai gow). Commission rules require changes to the licensee's system of internal controls be submitted to commission staff and approved prior to implementation. Changing card games requires changes to the internal controls. The issue is whether an agent is required to conduct an onsite review prior to allowing the licensee to operate the new game.

Reasoning:

While conducting an onsite review prior to the operation of a new game helps to ensure proper operations and surveillance coverage, the risk is minimal in allowing card room operators to change games immediately rather than waiting until an agent is available. Licensees are ultimately responsible for following all rules governing the operation of their card rooms regardless of how and when a game change is reviewed.

Decision:

Licensees must send internal control changes for game changes in writing to commission agents. The card room licensee may start operating the new game after receiving a verbal approval from the agent. The agent will verify the changes on their next visit to the card room.

Approved:

Cally Cass
Cally Cass, Assistant Director
Washington State Gambling Commission

Date:

7/15/05